Exhibit A

CONFIDENTIAL DOCUMENT

Exhibit B

Power Integrations, Inc. v.
Fairchild Semiconductor International, Inc.

Trial Volume 2
October 3, 2006

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BY MR. POLLACK:
Q: How about the frequency variation circuit?
A: Okay. The patent talked about counter output signals being frequency variation signals. Here is the same counter we talked about. This is the same frequency scaling block. This is the counter. So that's the frequency variation circuit providing the frequency variation signals.
Q: Okay. Got ahead of myself. Now the oscillator.
A: Okay. Again, the top level schematic diagram here is the switch down on this corner, up in the upper left corner block labeled OSC is a block oscillator that's going to provide the oscillation signal having a frequency range. The oscillation signal is labeled coming out of saw, s-a-w here. This is what we often refer to a sawtooth waveform, looks like a saw edge. That oscillation signal is going to vary in frequency as the oscillator is varied by jitter circuit.
Q: And how about the maximum duty cycle signal comprising au first state and second state, where is that shown?

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A: That's additional requirement of the oscillator in this claim and also present in the 210. That's the clock signal coming out, I have labeled it up here. These are the original — these waveforms were in the original document. The maximum duty cycle signal is up here, goes high and low and high and low levels. The first state in this particular case is the low level of the maximum duty cycle signal. The second state is the high level.
Q: Okay. I will put up the last element of '851, Claim 1, the drive circuit, is this also shown in the schematics of FSD210?
A: It is. I have highlighted as what we call a NOR gate. The one on the left it is in yellow. And driver block, the triangle device on the right, that provide the drive signal to the switch. When the maximum duty cycle signal is in its first state or low state here and when the magnitude of oscillation signal is below a variable threshold level.
So we are going to compare the oscillation signal, saw wavform, to a variable threshold signal, this is where the variable

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threshold signal comes in. That's back in the beginning when I mentioned feedback in the beginning of my time.
Q: What is your conclusion of the elements of Claim 1 of the patent and FSD210?
A: That it has all the elements of the claim.
Q: Okay. Let's turn to Claim 4 of the '851 Patent. What is Claim 4 generally about?
A: Claim 4, since it depends from Claim 1, has the variation circuit but adds another feature called SoftStart.
Q: What is SoftStart?
A: SoftStart is a feature that we add to solve some problems at startup.
Q: Are those problems described in the patent?
A: They are.
Q: This is column 1, 1 to 26 from PX-2.
A: The patent talks about inrush current and overshoot. What it is describing there, when you — one way to start off is by talking about, for example, a light bulb. Light bulbs don't usually burn out while sitting there using them, they burn out when you turn the switch on, that's

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because there is a big rush of current, so they are most liable to burn out. It is same in a switching power supply. The output voltage starts at 0 when you first put it on, so the feedback sees it as a very big difference from where it wants to be, so it is going to give it the most refill current it can, that can be more than the normal operating refill current and can stress the components in the regulator. It is more than they normally have to survive. You could put in more robust, bigger components to survive that initial rush, but they generally cost more. So that's not a good thing. The other thing that that initial surge of current does, is it does something that we call overshoot. Imagine taking a cup and trying to fill it with a fire hose to just the right level. If the recharge level is too high you can't stop filling the cup up at the right level. Same with the regulator refilling the capacitor is too high. The bucket is going to fill up too much, the output voltage is going to go too high, and in some cases go so high that it can damage things driven by the output of the regulator like

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a laptop.
SoftStart is a feature that is added to minimize those problems.
Q: Do you have an understanding as to what the specific SoftStart circuit that is recited in Claim 4, what that means in the context of this patent?
A: Yes. The Court construed that or determined the meaning of SoftStart as being a means-plus-function element.
Q: What is your understanding of that?
A: Means-plus-function element is first you have to look at the function that the claim is performing and then find the corresponding structures. In this case, in the patent, and for doing that function and compare them to the structures for doing that function in the accused's products.
Q: Let's begin with the discussion of how the SoftStart circuit of the '851 Patent is described in the example of Fig. 3.
Can you briefly explain what Fig. 3 shows with regard to that?
A: Sure. Fig. 3 shows the SoftStart circuit

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in a dashed line. There are three elements here: 450 is what we call a latch. 460 is a device called a comparator. And 45 is an AND gate. Initial powerup, you turn on a switch, you get a signal that resets — or sets the latch. What that means is a latch is a digital circuit that has two output states, high and low, for example, you can control one — if you send the signal to one input, it forces the output high. If you send it to the other it forces the output low and stays there in the state until you trigger the other input, that's what a latch is. So the power input signals it to start the SoftStart circuitry working. And this embodiment in Fig. 3 we have triangle wav, frequency variation signal coming into one input of the comparator. The comparator is going to compare two ramps. Ramp by ramp engineering means a signal that increases in value. Here we are going to compare the ramp from the oscillator, which is going fast. This might be a hundred thousand or million times a second. That ramp is going to be compared with another ramp, which is a frequency variation signal which is a slower moving ramp.

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Whenever the oscillator or fast ramp signal goes above a magnitude of the frequency variation signal the SoftStart circuit sends a signal to shut down the switch.
Q: I would like to refer you to Fig. 4 of the patent; does that describe that process?
A: Yes, it is. Here are the two different ramps. The fast one may be a hundred thousand times or million times a second. And the slow ramp, which comes from the frequeucy variation signal in the Fig. 3 circuit. But for the SoftStart circuit the switch would stay on for its maximum time on startup because there is a big error on startup that stresses things and could cause overshoot. So what this does is compares the two ramps. And whenever the fast ramp goes above the frequency variation signal you shut down the switch. So the switch is going to turn on at this bottom each time and it is going to be shut down whenever the fast ramp goes above the slow ramp. The result of that is they intersect at a higher and higher place over time and you are going to gradually increase the pulse width. Instead of having the switch on for the

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maximum time it gradually increases on the time that it is on and it gradually builds up and not give us the overshoot of stress.
Q: Did you reach any conclusions with Claim 4?
A: Yes. Claim 4 meets all requirements.
Q: Is there any dispute that the SoftStart circuit in FSD210 operates to gradually increase the current to solve the inrush and overshoot problems?
A: No. Mentions in the data sheet is an internal SoftStart circuit that gradually increases the current through the SensFET that's the switching transistor.
Q: Does the FSD210 provide a signal instructing the drive circuit to discontinue the drive signal when the magnitude of the oscillation signal is greater than the magnitude of the frequency variation signal?
A: It does.
Q: Can you explain where that is in the schematic?
A: Sure. The oscillation signal is coming out of the oscillator, it's that saw waveform.

Power Integrations, Inc. v.
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So, in fact, our book which is a decade before the patent or more, a decade or more includes a SoftStart circuit.
Q: So then what is this patent really about?
A: It's about a particular way that — in which SoftStart is accomplished, and which was the purpose of this patent or the claim of this patent.
Q: So you've heard Mr. Blauschild describe how SoftStart is means-plus-function, and you just mentioned that. Could you please remind the jury what it means for something to be a means-plus-function claim?
A: Again, my disclaimer, I'm not a lawyer. My understanding is that, first of all, it has to be a finding of the Court that it is a means-plus-function claim, and that has been found here. And a means plus — and a means-plus-function applies to an element of a claim. In this case, we're talking about the thing officially called SoftStart circuit.
And when a claim element or a term in a claim is ruled to be a SoftStart, a

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means-plus-function, it covers or is limited to the structure shown in the patent and describing — described in the specification, or the equivalents that perform or correspond to the claimed function.
That is, if someone were to do that function, but in a completely different way with a completely different structure, it would not be covered by the patent if it's a means-plus-function claim.
Q: Now, how do you know what portions of the specification you need to look at?
A: Well, that, too, has been the subject of an order by the Court who heard competing arguments and issued the order, and it spelled out in three figures and a set — set of lines within the specification that are ruled to be — to describe that structure that must be used.
Q: And so when you have something like that, that is, those columns and those line numbers, how do you use that, then, to determine what is actually referred to as the structure?
A: Well, in this case, luckily we —

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in fact, we have a figure — we have three figures and the figure is the text of the patent, the specification, so-called, it talks about the figures.
It says, Here's a figure and here's this thing, and it does this. So here we go.
The easiest way here is simply to walk through the text that has been ordered to describe the SoftStart circuit and see how it's read onto the figure.
So here, first, I think two of three of these slides just show some of the portion of the specification that was ruled. So Column 6, Lines 50 through 54 talk about a thing called SoftStart circuit, at block 410, it's green here.
Also, pulse width modulation signal, power up signal, 420, SoftStart enable signal, 421, and oscillator signal, 400. And these are all within the lines, rows and columns that were ordered by the Court.
The next one just adds some more — this is Lines 35 through 40, talks about the

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signal 400, and again within the SoftStart circuit ruled section includes frequency variation circuit, 405, preferably has an oscillator oscillating at a low frequency. Again, as Mr. Blauschild explained, that 400 wiggly thing up there looks like it's going a lot faster than this guy, 415.
But the real numbers here, this is about a hundred or a few hundreds times a second. This is probably a thousand or a few hundred thousands times a second. This is the fast one this is the slow one, low frequency oscillator.
Q: So I see here that you've included the frequency variation circuit, but aren't we talking about the SoftStart circuit? Why did you include that?
A: Well, I include it, because this is within the section of the specification that the Court said described the SoftStart circuit, and also, without a frequency variation circuit, the SoftStart doesn't work. It makes all the sense in the world.
And I think this is — this is, I

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think, maybe one more. Again, just reading along those lines, we've added now, I guess, the — this flip-flop, which they call a latch, 450, because there it is. That receives this signal.
You see this frequency, this oscillator circuit, 405, provides two things in here, provides this — where is this? This little signal here.
But it also provides a signal from here that is essential for the SoftStart operation as we'll see. I guess there's one more.
And here, an additional thing has been added, it's the 455, gate. Again, sorry for the confusion, but engineers use gate to mean two quite different things. And this is the kind of thing that you call a logic gate or an AND gate as opposed to the gates of a MOSFET.
Q: So all of the various parts that you've added, and you've colored up there, do all of these parts come from what the Court set forth as the structure?
A: Yes. They're all within the section that was described by the Court as or

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ordered by the Court to be the SoftStart circuit structure description.
Q: So could you explain quickly how the Power Integrations' SoftStart circuit works?
A: Yeah. I think this is perhaps helpful. There's — and I won't have much in the way in graphs here. This is the fast oscillator. And the fast oscillator is what says to the switch, turn on, and then when the voltage reaches the right amount, turn back off.
But the problem of SoftStart is when you first turn it on, the output voltage is zero. And the thing it says, help, I need lots of voltage. And this poor thing says, Give me more, give me more.
And it's trying to tell the switch to turn on continuously or maximum-duty cycle. And that's pretty rough on everything around it. It's a huge current impulse.
You can see the dim sometimes when you switch these things on. So what the SoftStart does is it basically says, Not so fast. We're going to use this comparity here and compare this fast switch signal against a

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very slowly rising SoftStart oscillator here move very slowly, only a few hundred times a second to go up and down.
And the very first portion of the first cycle, you've seen this before with graphs, tell this thing, no, stop, stop much sooner than you thought you should have stopped, because otherwise we're going to have a big inrush current and bad things are going to happen.
And so there's two oscillators, the one that says go slow, and the one that says I'm in the business of turning switches on and off. And there's an additional — so that's — I think we've seen that operation before in past slides.
What's new here?
Q: Oh, I'm sorry. Were you back on that?
A: No. This is fine. This is fine. There's an extra — there's this extra stuff here that I described as the flip-flop or the patent refers to it as a latch. Engineers are sometimes a bit loose with

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their language.
This thing here is important. In fact, it's required in this particular structural implementation of the SoftStart of this patent. Because as I said before, the analog triangle wave goes up and down forever. You see the meter just going nicely up and nicely down.
And what this thing does is says, I want to do a SoftStart for the first up from low up to maximum.
But I don't want to ride back down again. I'm started. I'm on the road.
And so what it does is this is the first rise here. Here's those pulses getting wider. We've seen these pictures before, and then this thing says — little traffic light says, okay, no more SoftStart. You've reached — you've made a soft landing on a higher plane. Just keep running now. There it is.
And that's what this latch does. It disables an undo of SoftStart. And if you didn't have it — we don't have it — here's what you would — what happens if you don't have

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copying, and that they're two very different devices.
MS. FEEMAN: Okay. Thank you, Doctor Wei.

CROSS-EXAMINATION
BY MR. POLLACK:

Q: Good afternoon, Dr. Wei.
A: Good afternoon.
Q: First of all, you haven't offered any opinions at all related to the '075 patent; correct?
A: That's correct.
Q: Okay. Now, with regard to the circuit patent, you base your opinions on an analysis of the Fairchild circuit looking at the circuit diagrams versus the Power Integrations' circuit diagrams and patents; right?
A: The patents, the circuits, the data sheets.
Q: Now, you would agree with me, wouldn't you, that the devices themselves can't copy one another, it's only really the designer of the device that might or might not copy another's design; right?

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A: I would agree that devices can be copies of one another, but it would have to be a hand that does any actions.
Q: Okay. And you'd also agree in order to copy something, you'd have to know what that thing is; right?
A: Well, to a certain extent, if I wanted to copy something, yes, I would have to know what it is. But actually, if I were to really — if I wanted to copy, the reason I would copy is because I didn't know how to do something.
So if I knew the answer to a question, I wouldn't need to copy the answer, I guess.
Q: Dr. We, during your — I took your deposition in this case; right?
A: Yes.
Q: And when I asked you the question, You'd agree with me in order to copy something, you have to know what that thing is, you said, yes; right?
A: Oh, yeah. Yeah. I'm agreeing with you there.

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Yeah. Yeah.
Q: Okay. Now, in forming your opinions on copying, you didn't discuss with Fairchild's engineers how they went about designing their circuits; right?
A: As you know, I was actually at the depositions for some of the devices, and so I spoke with Fairchild's engineers in terms of how the devices worked, and what different devices were there, and different various aspects of it.
But if you're asking me if I asked them, okay, how did you go about designing each of these different circuits with respect to the different functionalities; no, I did not.
Q: And in forming your opinions on copying, you didn't review any of the documents associated with Fairchild's reverse — research and development; right?
A: So I think you said —
Q: Research and development.
A: Okay. Research and development. The only extent to which I know of Fairchild's research and development comes from some of the conversations during the depositions

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that I sat in on.
Q: Okay. So you did attend those depositions in Korea; right?
A: I did.
Q: And you actually attended the deposition of Mr. Jeon and Mr. Jang; right?
A: Yeah. They were several days. Several days.
Q: But you didn't refer to anything you learned in those depositions in forming your opinions on copying; correct?
A: Correct, because I didn't feel that I needed to actually know what went through the minds necessarily.
I mean, it's really difficult to read someone else's mind. And I felt that if I looked at — because as a trained engineer who understands how circuits work by looking at two different circuits, I would be able to determine whether one is a copy of another.
Q: Well, now, you did learn during those depositions that Fairchild's designers knew about the Power Integrations' products while they were designing their own; right?

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A: Oh, yes.
Q: And you also knew that the Fairchild engineers reverse engineered Power Integrations' products that had, for example, the digital frequency jitter in it; right?
A: Insofar as I believe in industry, reverse engineering is commonly done. And so, yes, I know that they had, or I had heard that or during the deposition that they have reverse engineered the device while they were designing their products, yes.
Q: Okay. And you also know that while they were designing their devices, the Fairchild engineers looked at Power Integrations' patent; correct?
A: Yes, I believe that's true. Yeah.
Q: But, you didn't discuss today in your testimony or in forming your opinions any of those facts; right?
A: That's true. I didn't feel that I had to.
MR. POLLACK: No further questions, Your Honor.
MS. FEEMAN: No further questions.

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This witness can leave.
MR. GUY: Your Honor, do you mind if I put the easel over here a little further?
THE COURT: Sure.
MR. GUY: There's a lot of fine print on that, and I want to make sure they can see the '075.
MR. SCHERKENBACH: I don't think that's going to work.
MR. GUY: All right. I'll move it right here.
MR. GUY: Ladies and gentlemen, on behalf of Fairchild, Dr. Peter Gwozdz.
Dr. Peter Gwozdz will be taking the stand. He is Fairchild's witness regarding the '075 patent. He'll be offering his opinions.
Swear the witness, please.
THE CLERK: State and spell your name for the record.
THE WITNESS: My name is Peter Gwozdz and I live —
THE CLERK: Just state and spell your name.

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THE WITNESS: My last name is spelled G-W-O-Z-D-Z.
THE CLERK: Could you please place your left hand on the Bible and raise your right hand? Do you solemnly swear that the testimony you're about to give to the Court and the jury in the case now pending will be the truth, the whole truth and nothing but the truth so help you God?
THE WITNESS: I do.
PETER GWOZDZ,
the deponent herein, having first been duly sworn on oath, was examined and testified as follows:

DIRECT EXAMINATION
BY MR. GUY:

Q: Now, perhaps we should do that on the record. How is your last name spelled?
A: Gwozdz, G-W-O-Z-D-Z.
Q: Okay. And where do you currently reside?
A: I live in Cupertino, California.
Q: Is that in Silicon Valley,

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California?
A: Yes, that's in Silicon Valley.
Q: And if you could briefly give us your educational background?
A: I have a bachelor's degree in 1966 in physics, and a master's and Ph.D. in solid state physics in 1973 from University of Illinois.
Q: And can you give us briefly your background in semiconductors?
A: Well, I have over 40 years of experience in semiconductor technology, including work during graduate school.
Q: And if you could, just list, if you can — unfortunately because of our time, I'm going to be going through this a little bit quickly, I apologize.
But can you just give me a list of the companies you've worked with in Silicon Valley?
A: So let's see. After graduate school, I came right to Silicon Valley, in '73, and spent 15 years working in the industry. And I worked sequentially at National Semiconductor,

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independent claims are read by themselves in order to determine what each of the claims covers.
Claim 14 of the '366 patent, on the other hand, is a dependent claim. It refers to independent Claim 9. For a Fairchild product to infringe, then, Claim 14, which is, as I've said, is a dependent claim of the '366 patent, the Fairchild product must have all the elements of both Claim 1 and Claim 14. Therefore, if you find that an independent claim does not infringe, you must also find that all claims depending on that claim are not infringed.
I might have said Claim 1. In the example, I gave Claim 9. So it should be Claim 9, along with the dependent claim.
It's the Court's duty under the law to define what the patent claims mean. I've made constructions or interpretations, and I'm going to now instruct you on the meaning of certain terms in the patent claims at issue here.
You must apply the meaning that I give in each patent claim in deciding if the

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claim is infringed. You must ignore any different interpretation given to these terms by a witness or by an attorney.
You are advised that the following definitions for the following terms must be applied:
First, the term MOS transistor means a metal oxide transistor.
The term substrate means the physical material on which a transistor or micro circuit is fabricated.
The phrase a pair of laterally spaced pockets of semiconductor material of a second conductivity type within the substrate means two laterally spaced pockets of semiconductor material of the opposite conductivity type from the substrate.
The phrase a surface adjoining layer of material of the first conductivity type on top of an intermediate portion of the extended drain region between the drain contact pocket and the surface adjoining positions, means according to its plain — is construed according to its plain meaning, and therefore,

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no further construction was required by me.
The phrase said top layer of material is construed, again, according to its plain meaning when read in the context of the claim, and no further construction was required by me.
The term reverse bias voltage means a voltage applied across a rectifying junction with a plurality that provides a high resistance path.
The phrase substrate region there under which forms a channel is, again, construed according to its plain meaning when read in the context of the claim, and no further construction is required by me.
The term frequency jittering means varying the switching frequency of a switch mode power supply about a target frequency in order to reduce electromagnetic interference.
The term coupled means that two circuits are coupled when they are connected such that voltage, current or control signals pass from one to another.
The term primary voltage means a

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base or initial voltage, and the term is not defined by reference to the source from which it may be generated.
The term secondary voltage means a subsequent or additional voltage.
The term combining means adding together.
The term supplemental voltage means a voltage in addition to the primary voltage.
The term SoftStart circuit has been defined as a means-plus-function element. The functions of the various SoftStart circuits are construed in accordance with the plain meaning of the claim setting forth such SoftStart circuit functions.
The corresponding structures related to the SoftStart circuit are shown in Figures 3, 6 and 9 of the '366 patent and described in the specification of that patent at various columns. I'm not going to repeat them, but they're in the written instructions for you to look at.
The phrase frequency variation

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circuit means a structure that provides the frequency variation signal.
The phrase frequency variation signal means an internal signal that cyclically varies in magnitude during a fixed period of time and is used to modulate the frequency, the oscillation signal WELL in a predetermined frequency range.
I'm going to further talk with you now about means-plus-function claims. Claims 9 and 14 of the '366 patent and Claim 4 of the '851 patent has what is known as a means-plus-function element. Specifically, the SoftStart circuit element. The claim defines this element as a means for performing a specified function.
For example, a table could be claimed in a patent as being a tabletop, legs, and glue. Or an inventor could discuss in the patent the use of glue for attaching legs, and then claim a table as being a tabletop, legs and means for attaching the legs to the tabletop. The means-plus-function element would cover glue and any equivalent structure that performed the

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required function of attaching the legs to the tabletop.
I'm going to explain the three special rules that apply to this type of claim language.
First, the accused device must perform the same function as specified in the claim. If not, the claim containing that means-plus-function element is not infringed.
Second, if Fairchild's accused product does perform the required function, you must identify the structure in Fairchild's accused product that actually performs this function.
And, finally, you must determine whether that accused structure is the same as or equivalent to the structure identified in the patent for performing the required function.
If the structure of the accused device is the same as or equivalent to the structure in the patent that I have described, then the means-plus-function element is present.
Two structures are equivalent if a person of ordinary skill in the art would

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consider the differences between them to be insubstantial. One way to determine this is to look at whether or not the accused structure performs the identical function in substantially the same way to achieve substantially the same result.
Another way is to consider whether or not people of ordinary skill would have believed that the structure of the accused product and the structure in the patent were interchangeable as of the date the patent issued.
I'm now going to start with the instructions concerning patent infringement.
A patent owner may enforce its right to stop others from making, using, selling, offering to sell within the United States, or importing into the United States the patented invention by filing a lawsuit for patent infringement.
In this case, Power Integrations, the patent owner, has sued Fairchild, the accused infringer, and has alleged that Fairchild's products infringe one or more claims

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of Power Integrations' patents in suit.
The patent law provides that any person or business entity which makes, uses, sells, offers to sell, or imports without the patent owner's permission any product or method legally protected by at least one claim of a patent within the United States before the patent expires infringes the patent.
There are several ways to infringe a patent. One may directly infringe a patent either literally or under the Doctrine of Equivalents. Alternatively one may indirectly infringe a patent either one by inducing others to infringe a patent, in which case both the inducer and the direct infringer are liable for infringement, or two, by contributing to the infringement of a patent by another by supplying a component especially designed for the patented invention in which case both the direct infringer and the contributory infringer would be liable for patent infringement.
I just mentioned to you that one of the ways a patent may be infringed is if a person offers to sell in the United States